

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

In re:
HEART OF TEXAS SHOOTING
CENTER, LLC.

Debtor

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Chapter 11
Case No. 23-60263-mmp

DEBTOR'S MOTION TO DISMISS CASE

This pleading requests relief that may be adverse to your interests.

If no timely response is filed within 21 days from the date of service, the relief requested herein may be granted without a hearing being held.

A timely filed response is necessary for a hearing to be held.

COMES NOW, HEART OF TEXAS SHOOTING CENTER, LLC.. (“HOTSC” or “*Debtor*”) and hereby file its’ Motion to Dismiss and in support thereof would respectfully show as follows:

1. Debtor has been unable to confirm a plan in this case.
2. The Court has lifted the automatic stay to allow for foreclosure of the real property owned by the jointly administered Debtor, HOTSC Holdings, LLC.

This foreclosure is set for April 2, 2024.
3. Foreclosure of the real property will lead to loss of the ability to run the business.

4. Because there is no longer a reorganization to be pursued, this case should be dismissed.

Respectfully Submitted,

BARRON & NEWBURGER, P.C.
7320 N. Mopac Expy, Suite 400
Austin, Texas 78731
(866) 476-9103

/s/ Stephen Sather
Stephen Sather
State Bar No 17657520
ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion was served by first class mail, postage prepaid and properly addressed, on March 18, 2024 to all parties listed on the attached Service List, to the persons listed below by email and electronically by the Court's ECF system to all parties registered to receive such service.

/s/ Stephen Sather
Stephen Sather

Label Matrix for local noticing
0542-6
Case 23-60263-mmp
Western District of Texas
Waco
Wed Dec 6 14:08:21 CST 2023

HOTSC Holdings, LLC
5040 S. Loop 340
Robinson, TX 76706-4638

Heart of Texas Shooting Center, LLC
5040 S. Loop 340
Robinson, TX 76706-4638

U.S. BANKRUPTCY COURT
800 FRANKLIN AVE., SUITE 140
WACO, TX 76701-1934

American Express
PO Box 981535
El Paso, TX 79998-1535

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Crow Shooting Supplies
200 South Front Street
Montezuma, IA 50171-1184

Davidson's
2625 Stearman Rd
Prescott, AZ 86301-6142

Davidson's, Inc.
c/o Underwood Law Firm, P.C.
P. O. Box 9158
Amarillo, TX 79105-9158

First National Bank of McGregor
901 S. 8th Street
Waco, TX 76706-1143

First National Bank of McGregor
c/o Michael P. Menton
3333 Lee Parkway, 8th Floor
Dallas, Texas 75219-5111

Heckler & Koch
5675 Transport Blvd.
Columbus, GA 31907-1471

IFPS Corporation
PO Box Box 419090
Kansas City, MO 64141-6090

IFPS Corporation
POB 419090
Kansas City, MO 64141-6090

IFPS Corporation
30 Montgomery Street
Suite 501
Jersey City, NJ 07302-3821

KXXV 25
Scripps Media, Inc.
PO Box Box 203584
Dallas, TX 75320-3584

Lipseys
7277 Exchanger Drive
Baton Rouge, LA 70806

McLennan County
c/o Diane W. Sanders
Linebarger Goggan Blair & Sampson, LLP
P.O. Box 17428
Austin, TX 78760-7428

McLennan County Tax Office
P.O. Box 406
Waco, TX 76703-0406

Mike Smiley
Underwood Law Firm
PO Box 9158
Amarillo, TX 79105-9158

Norma Precision
2 East Bryan St. Suite 1300
Savannah, GA 31401-2672

Norma Precision Inc.
200 Blue Moon Crossing, Suite 100
Pooler, GA 31322
Unites States 31322-9697

(p)KERRI NICKS
ATTN RSR GROUP
4405 METRIC DRIVE
WINTER PARK FL 32792-6904

Scripps Media, Inc.
c/o Kohner, Mann & Kailas, S.C.
4650 North Port Washington Road
Milwaukee, Wisconsin 53212-1077

Sports South, LLC
101 Robert G. Harris Drive
Shreveport, LA 71115-3602

Star Advertising
38 Timber Ridge Trl
Lorena, TX 76655-3035

The First National Bank of McGregor
c/o Michael P. Menton
3333 Lee Parkway, 8th Floor
Dallas, TX 75219-5111

United States Trustee - WA12
United States Trustee
903 San Jacinto Blvd, Suite 230
Austin, TX 78701-2450

Waco ISD
c/o McCreary, Veselka, Bragg & Allen
Attn: Julie Anne Parsons
P.O. Box 1269
Round Rock, TX 78680-1269

iHeart Media, Inc.
c/o Law Office of Richard Avis
5500 Pearl St Suite 250
Des Plaines, IL 60018-5301

Eric Terry
Eric Terry Law, PLLC
3511 Broadway
San Antonio, TX 78209-6513

Stephen W. Sather 4
Barron & Newburger, PC
7320 N MoPac Expy, Suite 400
Austin, TX 78731-2347

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

RSR Group
4405 Metric Dr.
Winter Park, FL 32792

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Eric Nutt

(u)HOTSC Holdings, LLC

End of Label Matrix	
Mailable recipients	31
Bypassed recipients	2
Total	33